

1 Michael J. Morrison, Esq.
2 Nevada State Bar No. 1665
3 1495 Ridgeview Drive, Suite 220
Reno, NV 89519
Tel. 775-827-6300
venturelawusa@gmail.com

4 *Attorney for Defendants*
5

6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8
9 JOSEPH WEINFELD, LIANA
KNIJKOVA, ISAAC WEISS, ROBERT
FRANK, YEHUDAH NUSSBAUM, MOSES
STEINMETZ, ALBERT ISAAC, JOSEF
KOHN, MICHAEL FRIEDMAN, and
CONGREGATION BETH JOSEPH,
derivatively on behalf of PRECIOUS
MINERALS MINING AND REFINING
CORP.,

10 Plaintiffs,

11 vs.

12 BILL L. MINOR, JOHN H. REYNOLDS,
and WALTER A. MARTING, JR.,

13 Defendants

14 PRECIOUS MINERALS MINING AND
REFINING CORP., a Nevada Corporation,

15 Nominal Defendant

16 3:14-cv-00513-RCJ-WGC

17 **STIPULATION AND ORDER
TO EXTEND THE DEADLINE
FOR DEFENDANTS TO REPLY
IN SUPPORT OF THEIR
MOTION FOR ATTORNEY'S
FEES AND COSTS**

18 **(First Request)**

22 Plaintiffs JOSEPH WEINFELD, LIANA KNIJKOVA, ISAAC WEISS,
23 ROBERT FRANK, YEHUDAH NUSSBAUM, MOSES STEINMETZ, ALBERT
24 ISAAC, JOSEF KOHN, MICHAEL FRIEDMAN, and CONGREGATION BETH
25 JOSEPH, derivatively on behalf of PRECIOUS MINERALS MINING AND
26 REFINING CORP. ("Plaintiffs") and Defendants BILL L. MINOR, JOHN H.
27 REYNOLDS, and WALTER A. MARTING, JR. ("Defendants"), and pursuant to LR

1 IA 6-1, LR IA 6-2 and LR 7-1, stipulate and agree as follows:

2 On March 27, 2018, this Court entered its Order and Judgment in this case in
3 favor of the Defendants (ECF Nos. 157, 158). On April 10, 2018, Defendants filed
4 their motion for attorney's fees and costs (ECF No. 160), which the Plaintiffs opposed
5 on May 29, 2018 (ECF No. 176) after the parties stipulated to and this court permitted
6 extensions of time for them to do so (ECF Nos. 173, 175). The current deadline by
7 which the Defendants must reply in support of their motion for attorney's fees and
8 costs is June 5, 2018.

9 In order to address irregularities that occurred in the information that was filed
10 by the Defendants at the time they filed their motion for attorney's fees and costs, the
11 Defendants seek additional time to remedy those irregularities and to meaningfully
12 reply in support of their motion.

13 By this stipulation, which is the first stipulation for an extension of time for the
14 Defendants to reply in support of their motion for attorney's fees and costs, the parties
15 agree that the Defendant shall have an additional two (2) weeks to file their reply – to
16 and including Tuesday, June 19, 2018. This stipulation is made by the parties in good
17 faith and not for any improper purpose.

18 ///

19 ///

20 ///

21

22

23

24

25

26

27

28

Thus, good cause appearing, the parties agree and stipulate that the current deadline for the Defendants to reply in support of their motion for attorney's fees and costs shall be extended for two (2) weeks. The Defendant shall have to and including Tuesday, June 19, 2018, to reply in support of their motion for attorney's fees and costs.

DATED this 5th day of June, 2018.

APPEL LAW FIRM PLLC

LAW OFFICES OF MICHAEL J.
MORRISON

/s/ Chaim Z. Appel
Chaim Z. Appel, Esq.
(*pro hac vice*)
4533-16 Avenue
Brooklyn, New York 11204
(212) 252-2045
cappel@customsandlaw.com

/s/ Michael J. Morrison
Michael J. Morrison, Esq.
Nevada State Bar No. 1665
1495 Ridgeview Drive, Suite 220
Reno, NV 89519
Tel. (775) 827-6300
venturelawusa@gmail.com

Counsel for Plaintiffs

Counsel for Defendants

IT IS SO ORDERED.

UNITED STATES / JUDGE

DATED: June 19, 2018